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April 21, 2021

**BY ECF**

The Honorable Alison J. Nathan  
United States District Court  
Southern District of New York  
United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: *United States v. Ghislaine Maxwell*, 20 Cr. 330 (AJN)**

Dear Judge Nathan:

Pursuant to the Court's Opinion and Order, dated April 16, 2021 (Dkt. 207), the parties have met and conferred about a schedule for the remaining pretrial disclosures and other pretrial motions practice. Although Ms. Maxwell maintains that a continuance of the trial date is necessary to ensure a fair trial for the reasons we will set forth in our letter to the Court tomorrow, we have discussed with the government disclosure dates assuming the trial begins on July 12, 2021.

The following schedule indicates the areas of agreement and disagreement between the parties. Areas of agreement include dates proposed by both parties (in bold). Areas of disagreement include dates proposed by the defense (in bold) and dates proposed by the government (underlined).

**Parties Agree**

Government Expert Witness Disclosure  
**April 23** – Government expert disclosure

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Supplemental Pretrial Motions

- **May 7** – Defense supplemental motions due
- **May 21** – Government’s response due
- **May 28** – Defense replies due

Identities of the Accusers

- **May 17** – Government will disclose the identities of the accusers to the defense

Motions in limine

- **June 14** – Simultaneous filing of motions in limine by government and defense
- **June 28** – Simultaneous responses due

Requests to Charge, Verdict Sheet, Proposed Voir Dire

- **June 25** – Parties submit these materials to the Court

Jury Questionnaire and Pretrial Conferences

- **June 18** – Parties submit proposed jury questionnaires to the Court
- **Week of June 28** – Prospective jurors complete jury questionnaire
- **July 1** – Pretrial conference; parties receive completed jury questionnaires
- **July 9** – Final pretrial conference; parties exercise challenges based on jury questionnaires

**Parties Disagree**

Government Pretrial Disclosures

- **May 17** (eight weeks before trial) – the following government pretrial disclosures due:
  - Jencks Act/3500 material
  - 404(b) notice
  - *Giglio* material (any *Brady* material should be produced immediately)
  - Co-conspirator statements
  - Government witness list
  - Government exhibit list
- The government proposes May 28 to produce Jencks Act/3500 material, 404(b) notice, *Giglio* material, and its witness list
- The government proposes June 11 to produce its exhibit list and marked exhibits

Defense Expert Witness Disclosure

- **June 14** – Defense expert disclosure
- The government proposes May 14 for the defense to provide its expert witness disclosure

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Defense Pretrial Disclosures

- **July 1** – Preliminary disclosure of information subject to Rule 16(b)(1)(A) and 16(b)(1)(B)
- The government proposes June 11 for the defense to disclose this information, as well as its witness list and witness statements pursuant to Rule 26.2.

Sincerely,

/s/ Christian Everdell  
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cc: All Counsel of Record (By ECF)